

1 MARK H. LIPTON, ESQ.
LIPTON HALLBAUER
2 1380 Lead Hill Boulevard, Suite 106
Roseville, CA 95661
3 Telephone: (916) 652-2221
Facsimile: (916) 652-1211

4 Attorney for Plaintiff Ramona Opray

5 GALTON & HELM LLP
6 DANIEL W. MAGUIRE, State Bar No. 120002
EDITH S. SHEA, State Bar No. 177578
7 500 South Grand Avenue, Suite 1200
Los Angeles, California 90071-2624
8 Telephone: (213) 629-8800
Facsimile: (213) 629-0037

9 Attorneys for Defendant Hartford Life and Accident Insurance Company

11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

14 RAMONA OPRAY,

15 Plaintiff,

16 vs.

17 HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANY, the
18 appropriate named fiduciary of the
GLAXO, INC. LONG TERM
19 DISABILITY PLAN, GLAXO, INC.,
LONG TERM DISABILITY PLAN,

20 Defendant.
21

CASE NO. CV 00536 GEB (PAN)

**STIPULATION TO EXTEND TIME
FOR THE FILING OF MOTIONS
AND FOR PRE-TRIAL
CONFERENCE**

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Case No. CV 00536 GEB (PAN)
STIPULATION TO EXTEND DEFENDANTS'
TIME TO RESPOND TO INITIAL COMPLAINT

GALTON & HELM LLP
500 SOUTH GRAND AVENUE, SUITE 1200
LOS ANGELES, CALIFORNIA 90071-2624
TELEPHONE: (213) 629-8800

FILED

OCT 27 2005

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

1 Plaintiff Ramona Opray and Defendant Hartford Life and Accident Insurance
2 Company hereby stipulate and agree as follows. The Court has scheduled the
3 following dates in this action:

4
5 Motion hearing cut-off: November 21, 2005

6
7 Last day to file joint pre-trial statement: January 16, 2006

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9 Pre-trial Conference: January 23, 2006

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11 Trial: April 4, 2006.

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13 The parties request that the pre-trial schedule in this case be continued for
14 approximately sixty five days, to allow the parties sufficient time to complete a
15 mediation before preparing cross-motions for summary judgment in this ERISA
16 matter. The parties have exchanged initial disclosures and have begun settlement
17 discussions in anticipation of mediation. However, due to the parties' (one of which
18 will have to travel from Connecticut to attend the mediation) and the chosen
19 mediator's schedules, the earliest that a mediation can be scheduled in this case is
20 December 20, 2005. The parties have scheduled a mediation for that date, before
21 Retired Judge Raul Ramirez, and request this extension so that mediation can be
22 completed prior to the preparation and filing of motions for summary judgment.

23
24 The parties do not seek an extension of the trial date and have not previously
25 sought an extension of the pre-trial dates in this action. Moreover, the parties expect
26 that they may stipulate to a waiver of the pre-trial conference, because if this case is
27 not resolved on summary judgment, the trial would likely be based solely on briefs
28 and the evidence would likely be limited to the administrative record.

Wherefore, the parties request that the pre-trial dates be continued as follows:

Motion hearing cut-off: January 30, 2006;

Last day to file joint pre-trial statement: March 20, 2006; and

Pre-trial Conference: March 27, 2006.

DATED: October 13, 2005

LIPTON HALLBAUER
MARK H. LIPTON

By: /s/ Mark H. Lipton

MARK H. LIPTON
Attorneys for Plaintiff Ramona Opray

DATED: October 13, 2005

GALTON & HELM LLP
DANIEL W. MAGUIRE
EDITH S. SHEA

By: /s/ Edith S. Shea

EDITH S. SHEA
Attorneys for Defendant Hartford Life and
Accident Insurance Company

ORDER

IT IS ORDERED that the motion hearing cut-off is continued to January 30, 2006, the last day to file a pre-trial statement is continued to March 20, 2006 and the pre-trial conference is continued to March 27, 2006, at 1:30 p.m. The trial date is continued to June 27, 2006, at 9:00 a.m.

DATED: October 24, 2005


UNITED STATES DISTRICT COURT
JUDGE